

ST. AR
AR 2.1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

October 22, 1992

In Reply
Refer To: HW-113

Robert L. Geddes
Senior Environmental Engineer
Monsanto Chemical Company
P.O. Box 816
Soda Springs, ID 83276

Subject: Phase II Remedial Investigation/Feasibility Study
(RI/FS) Work Plan for the Soda Springs Elemental
Phosphorus Plant

Dear Mr. Geddes:

The purpose of this letter is to provide you with approval to proceed with Tasks 3 and 4 of the Phase II RI/FS Work Plan dated July 22, 1992, (as modified in your subsequent responses to EPA comments) subject to incorporation of the changes we discussed at our meeting on October 15th. The changes we agreed to are described below. You must acknowledge your agreement to incorporate them in the Work Plan prior to the start of Phase II sampling.

The following changes were discussed and agreed to:

- 1) addition of arsenic to the list of analytes for Task 3, the Soda Creek Sediment Investigation;
- 2) addition of total chromium to the list of analytes for Task 4, the Soils Investigation; and
- 3) addition of a new task: a gamma survey consisting of 1 measurement taken at each off-site soil sampling location (including those sampled during Phase 1) and multiple measurements from selected on-site locations. The on-site locations of interest are the slag pile (10 measurements), underflow solids piles that won't be recycled (5-6 measurements), and the baghouse dust storage areas (5-6 measurements). The survey should be done using the same type of hand-held instrument which Kerr-McGee used to conduct theirs, and the results should be provided to EPA as soon as possible in the same format which Kerr-McGee used. The results of this

survey will be used in the risk assessment for both current and future scenarios.

Two additional comments relevant to this sampling event have come up since we met. First, in order to best support the risk assessment, EPA recommends that some of the soil sampling locations to the east of the site be moved to locations which are closer to potential receptors. I have asked Mr. Eldridge of SAIC to send you our specific suggestions under separate cover. You should address this proposal when you respond to this letter.

Finally, since we met, EPA has completed its review of the supporting Air Quality documentation for the Preliminary Site Characterization Report and we are preparing complete comments to send to you in the near future. One of the comments includes a recommendation which potentially calls for additional sampling similar to what is planned for the field work which is about to start. Therefore, while we have not had the opportunity to discuss this with you yet, the following comment is provided for your consideration. You should include a response to this comment in your response to this letter. If you need further clarification or wish to discuss this item, please call me as soon as possible.

Section 5 of the Supporting Documentation Report (SDR) presents trace metals analyses for the furnace tap-hole fume collector, the kiln venturi scrubbers, and the nodule crushing and screening scrubber. Unfortunately, no information was provided to indicate the method(s) used to collect the sample. Without documentation of the source testing performed, the adequacy of the characterization of the sources cannot be determined. The supporting documentation for the source testing component of the trace analysis work should be provided for review, if it exists. If no such report exists or the methods used are not acceptable to EPA, Monsanto should conduct additional testing of these sources to verify the values used in PSCSR and any subsequent modeling analyses.

EPA's review of the Phase II Work Plan is now complete except for evaluation of the data from the May 1992 groundwater sampling event. EPA would like to meet with you during the week of November 2, 1992 to discuss its remaining comments on the Work Plan and its response to the October 5, 1992 letter from Golder Associates on your behalf. At that time EPA will be prepared to discuss completion and final approval of the Phase II Work Plan.

As you know, I had hoped to bring Bill Ryan to Soda Springs on November 2, 1992 in order to familiarize him with the site and to meet with you. Unfortunately, Bill is critically needed on another project at this time and will not be available to travel to Soda Springs in the near future. I would still like to come

out with Jim Eldridge to see the site and meet with you that week. However, since Bill is not available, I would prefer to come to Idaho on Wednesday, November 4th instead of Monday, November 2nd. Please advise me if that would be acceptable to you.

If you have any questions about this letter please do not hesitate to call me at (206) 553-2100. I will be in Washington D.C. from October 26-29, 1992, but will be checking messages and returning calls as frequently as possible. If you have questions of a technical nature and I am unavailable, please call Jim Eldridge of SAIC at (206) 485-2818.

Sincerely,


Timothy H. Brincefield
Superfund Project Manager

Enclosure

cc: Charles Ordine, EPA ORC
Lorraine Edmond, EPA ESD
Don Matheny, EPA ESD
Gordon Brown, IDHW
Mike Thomas, IDHW
Jim Eldridge, SAIC
David Banton, Golder Associates